Remarks

Claims 1-30 are pending in the application. All claims stand rejected. By this paper, claims 1-5, 9-15, 19-25, and 29-30 have been amended   New claims 31-60 have been added to provide claim coverage commensurate with the scope of the invention. No new matter has been added.

Claims 2, 9, 12, 19, 22, and 29 were objected to because of a number of informalities. These claims have been amended per the Examiner's suggestions.

Claims 1-30 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,564,213 to Ortega et al. ("Ortega"). Claim 1 has been variously amended to more particularly point out and distinctly claim the subject matter that the applicants regard as their invention. As amended, claim 1 recites a method <u>for selecting a multimedia program within an entertainment system,</u> comprising:

> detecting a first word <u>of a multimedia program</u> entered by a user with a character-entry device; and

> providing a potential list of second words for the multimedia program to said user, said potential list of second words selected based, at least in part, on <u>how frequently a multimedia program whose name includes one of the second words has been played by the entertainment system.</u>

These claimed features recognize the fact that a user of an entertainment system typically has a number of favorite multimedia programs (*e.g.*, television programs, songs, etc.). The user may replay the favorite program many times. Hence, the probability that the user is entering the name of a previously-played multimedia program is higher than that of other multimedia programs. These claimed features leverage this fact by selecting a potential list of second words for the multimedia program based, at least in part, on how frequently a multimedia program

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whose name includes one of the second words has been _played_ by the entertainment system.

Initially, Ortega does not even relate to selecting a _multimedia program_ within an _entertainment system_. Moreover, Ortega does not consider how many times a multimedia program has been _played_ by the entertainment system in determining a potential list of second words.

As the Examiner correctly points out, Ortega does look at the frequency with which a string has appeared within a search query. However, this is not the same as considering how many times a particular multimedia program has been _played_. There are many ways in which a multimedia program can be _played_ without the use of a search query. For instance, programs can be selected from a "Now Playing" list, invoked using a hot key, or even randomly selected. Ortega does not disclose or suggest basing a potential list of second words on the frequency of which a multimedia program containing each word has been _played_ by an entertainment system.

Similarly, claim 4 recites the additional step of ordering a potential list of second words based, at least in part, on _how frequently a multimedia program whose name includes one of the second words has been played by the entertainment system_. As noted above, Ortega does not _select_ words based on how frequently a multimedia program containing the words has been _played_. Likewise, Ortega does not _order_ the selected words on a similar basis.

Claims 9 and 10 have been amended to recite the steps of:

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calculating a <u>first</u> probability that said second word will be selected by said user based, at least in part, on said number of times [said user has selected said second word following said first word].

* * *

calculating a <u>second</u> probability that said second word will be selected by said user by combining said first probability with a probability derived from <u>how frequently a multimedia program whose name includes one of the second words is included in a database</u>; and

selecting said potential list of second words according to said second probability.

This claim recites the selection of a potential list of second words using a combination of <u>two</u> probabilities based, respectively, on <u>user preference</u> and <u>incidence</u>, *i.e.*, a probability derived from the number of times the user has selected a particular second word following a particular first word <u>and</u> a probability derived from how frequently a multimedia program whose name includes one of the second words is included in a database. Ortega does not disclose combining two different types of probabilities in order to select a potential list of second words.

In view of the foregoing, the applicants respectfully submit that claim 1, as amended, is patentably distinct over the cited reference. Independent claims 11 and 21 have been amended to include similar limitations and are believed to be patentably distinct for at least the same reasons. Claims 2-10, 12-20, and 22-30 depend directly or indirectly from claims 1, 11, and 21, respectively, and are likewise believed to be patentably distinct.

New claim 31 recites a method comprising:

detecting a first word entered by a user with a character-entry device;

providing a potential list of second words to said user, said potential list of second words selected based on the likelihood that each of said words

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contained in said potential list of second words will be selected by said user following said first word; and.

mapping a word from said potential list of second words onto a single button of the character-entry device such that pressing said single button results in entry of the entire mapped word.

These claimed features allow a user to easily enter an entire second word by simply pressing a corresponding button on the remote control. Thus, the user does not need to look away from the television to enter text or select multimedia programs to watch or record.

Ortega does not disclose or suggest mapping a word from said potential list of second words onto a single button of the character-entry device such that pressing the single button results in entry of the entire mapped word, as required by new claim 31. In Ortega, a user must either type in a word or select it from a list. There is no mapping of entire words to buttons of a character-entry device. Accordingly, claim 31, as well as dependent claims 32-40, are patentably distinct over the cited reference. New claims 41 and 51 include similar limitations and are likewise believed to be patentably distinct, along with dependent claims 42-50 and 52-60, respectively.

New claim 32 recites mapping each of a plurality of words from said potential list of second words onto each of a plurality of different buttons of the character-entry device such that pressing a button results in entry of an entire word corresponding to the pressed button. Ortega does not disclose or suggest mapping one word onto a single button of a character-entry device, let alone a plurality of words onto a plurality of corresponding buttons.

New claim 33 recites displaying a representation of the plurality of buttons on a display screen with an indication of the corresponding mapped word for each

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button. The displayed representation allows a user to easily locate the correct button on the remote control device to enter a desired word without having to look away from the television. This may be accomplished by touch, even in the dark.

Ortega does not teach or suggest displaying a representation of the plurality of buttons on a display screen. Indeed, as argued above, Ortega does not map potential second words to individual buttons of a character-entry device.

New claim 34 recites displaying graphical representations of the plurality of buttons arranged in a layout similar to that of the character-entry device. In effect, the claimed representation is an on-screen map of the character-entry device, allowing the user to easily locate the correct button. Ortega does not disclose displaying any type of representation of a plurality of word-mapped buttons, let alone a representation having a layout similar to the character-entry device.

New claims 35 and 36 recite that the layout comprises a star pattern, where the star pattern comprises nine buttons with a center button and eight buttons forming a periphery around the center button. This configuration allows a user to easily find a button by touch without having to look away from the television screen. Ortega does not disclose or even suggest such a layout for a character-entry device.

New claim 37 recites mapping the plurality of words to the plurality of buttons in an alphabetical order around the periphery of the star pattern. This allows a user to quickly locate the desired word because the mapping will always be done in a consistent order. Ortega does not disclose or suggest an alphabetical layout. Indeed, Ortega actually teaches away from an alphabetical ordering since it discloses listing words in order of rank. Col. 7, lines 2-3.

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New claim 38 recites configuring a particular button of the character-entry device, such as a "More" button, for remapping a second plurality of words to the plurality of buttons. Often, the number of possible second words will exceed the number of available buttons. Accordingly, the "More" button allows the user to cycle through the possible choices without having to look away from the television. The second plurality of words may be the next most likely second words to be selected by the user, as recited in claim 39.

As argued above, Ortega does not disclose the mapping of words to individual buttons, let alone a specifically-designated button for remapping the buttons to a different set of potential second words, as recited in claim 40.

In view of the foregoing, the applicant respectfully submits that claims 1-30, as amended, as well as new claims 31-60, are patentably distinct over the cited reference. Early allowance of all pending claims herein is respectfully requested.

Respectfully submitted,

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